



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Economic Support
Bureau of Welfare Initiatives

**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
FSET Administrative and Provider Agencies
Child Care Coordinators
W-2 Agencies**

BWSP OPERATIONS MEMO

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SUBJECT: W-2 24-MONTH EXTENSIONS

CROSS REFERENCE: W-2 Manual
BWSP Operations Memo 99-49

EFFECTIVE DATE: Immediately.

PURPOSE

This memo provides W-2 agencies with:

1. Background on why the Department of Workforce Development (DWD) needs specific information when processing extensions.
2. A 24-Month Extension Request checklist that provides W-2 agencies with additional guidance in preparing extensions.
3. An explanation regarding DWD's recommended action steps resulting from extension reviews.
4. Guidelines when transferring potential extension cases between W-2 agencies.
5. An updated form (DES 11283) for submitting subsequent extensions to DWD for review.

BACKGROUND

Upon the request of the W-2 Contract and Implementation Committee, a workgroup was convened to discuss a number of issues surrounding the 24-month extension process. The workgroup consisted of W-2 agency representatives, the Division of Economic Support (DES) Division Administrator, DWD legal counsel and staff from DES's Bureau of Field Support and Bureau of Work Support Programs.

Based on the workgroup's discussions, it was determined that the following information should be shared with the W-2 agencies:

1. Information that will assist agencies in preparing extension requests. This includes background information that explains why DWD requests specific items for its extension review; an explanation on

how DWD utilizes this information; and a checklist that will assist agencies in compiling initial and subsequent extension information.

2. An explanation regarding the implications of the recommended actions steps that are included in the letter to the W-2 agency notifying them of DWD's response to a W-2 agency's extension approval concurrence request.
3. Guidelines agencies should follow when transferring cases approaching their time limit.

INFORMATION NEEDED TO PROCESS EXTENSION REVIEWS

Purpose of the Department's Internal Review Process

As provided by in Wisconsin Stats., 49.147(3)(c), (4)(b)(2), and (5)(b)(2) the W-2 agency may, with concurrence of DWD, grant extensions to W-2 participants in all W-2 subsidized employment positions (Trial Job, Community Service Job and W-2 Transition) if they meet the statutory extension criteria specific to the employment position. As reiterated in Operations Memo 99-49, it is the W-2 agencies' responsibility to determine if a W-2 participant qualifies for an extension based on the statutory criteria. If the W-2 agency determines that an individual qualifies for an extension, they must submit the approval to DWD for concurrence. DWD then reviews the information to determine that, based upon the facts available, the granting of an extension is a reasonable conclusion by the W-2 agency.

The statutory requirement is not the sole reason DWD reviews all extension approvals. DWD has the responsibility to implement the policy established by the state legislature. Therefore, DWD must have firsthand knowledge of the types of cases that require extensions. Additionally, it is crucial that all available resources be identified to assist the hard-to-serve population approaching the time limit. This is particularly important in light of the approaching 60-month federal and state lifetime limit. Therefore, DWD's review allows DWD to review all extension approval cases and identify resources that the W-2 agency may or may not be aware of, but which may be available for these harder-to-serve cases. As a result, the W-2 agencies are provided with recommended case management steps that may assist participants who have reached this critical stage in their W-2 participation. (See "Recommended Action Steps").

While these case reviews are **not** a step in the contract compliance process, issues identified in **any** case review may be potential future contract issues, so DWD believes it is important to alert the responsible agency or agencies of DWD's assessment. Of course, an agency is only responsible for the case management for the period in which it had the case.

Because DWD's review serves more than one purpose, there are two types of information requested by DWD:

1. Information necessary to determine if the agency had sufficient facts and reasonable basis to arrive at its extension approval decision (D); and
2. Information necessary to understand the agency's case management plan (C).

Where appropriate, the 24-MONTH EXTENSION REQUEST CHECKLIST attached to this Memo contains either a D or a C next to specific items to let agencies know the reason for requested information.

Need for Additional Information

DWD, through your local DES regional office, may have a need for additional case information to supplement an extension request. Circumstances under which DWD may request additional information are:

1. An incomplete extension record was provided. An incomplete extension record would be a record that did not contain one of the items asked for on the 24-Month W-2 Employment Position Extension Request form (DES 11282) or the 24-Month W-2 Employment Position Extension Review Request form (DES 11283) necessary for subsequent extensions, should they be requested.

2. Clarification is needed regarding how the W-2 agency reached its conclusion that a W-2 participant qualified for an extension based on the statutory criteria. Based on the information submitted in the extension, if it is not clear to DWD how the W-2 agency arrived at its approval decision or DWD does not immediately see how it could concur with the agency's decision, DWD may ask for additional clarifying information.

When DWD does not concur with a W-2 agency's extension approval, the W-2 agency may supplement the information and ask DWD to reconsider if the agency believes that DWD made a material error in its decision. If, again, DWD does not concur with the W-2 agency's decision, and in the future there is a substantial change in the case circumstances, the W-2 agency may then reapply for an extension.

24-MONTH EXTENSION REQUEST CHECKLIST

The following has been developed to assist you in preparing extension forms.

- ☒ **Are pages 1 and 2 of the request filled out?** All sections of the form must be filled out. If necessary, questions can be answered on additional paper and attached to the form.
- ☒ **Do you have the correct Last Day of the Participant's 24th Month (or the last day of the current extension)?** On screen AIWC, locate the number of months of eligibility used in the UD column for the participant's current W-2 employment position. That number reflects the number of months of eligibility used as of the last business day of the previous month. In order to determine the last day of the 24th month, count forward (including the month you are in) until you reach 24 months. The individual's last day would be the last day of that month. (D)

Example: In the month of May, Worker A trans to AIWC. The participant is currently in a W-2T. The UD column next to W-2T indicates that the participant has used 18 months of eligibility in the W-2T placement as of the last business day of April. Therefore, the participant is currently in his/her 19th month of eligibility of a W-2T placement. In order to determine the last day of the participant's 24th month, the worker counts forward six months (18 months plus six months equals 24 months). October 31 would be the last day of the participant's 24 months of eligibility in a W-2T as long as s/he continuously participated.)

April	May	June	July	August	September	October
18	19	20	21	22	23	24

- ☒ **Have you attached a case summary?** A case summary is required for both initial and subsequent extension reviews. However, the information required in the case summary for the initial extension differs somewhat from the information required in subsequent extension. In both cases, however, the case summary is an opportunity for the FEP to submit his or her observations and insights regarding the case. Also, in both cases, the case summary must **not** be combined with the long-term agency plan and supporting facts. These items must be distinctly separate. (D)

Initial Request Case Summaries

Initial case summaries must contain: family demographics, brief history of participant's receipt of W-2, participant's education and work experience, participant's attitude toward work and W-2 and any additional information the W-2 agency believes is pertinent to the request.

Subsequent Request Case Summaries

Subsequent case summaries must contain: Any changes in family demographics; an explanation of the outcomes of the recommended action steps provided by DWD in its response to the previous extension request (in cases in which recommended action steps were not appropriate, explain why a particular action step was not appropriate); the participant's progress in the W-2 activities assigned during the current extension period; and any additional information the W-2 agency believes is pertinent to the subsequent request.

- ☒ **Have you included a proposed Employability Plan (EP)?** The dates on the proposed EP must begin on the first day of the potential extension period and cover the entire extension period. The

participant need not sign proposed EPs. You may also submit current EPs as well, though this is not a requirement. Current EPs should be signed. (C)

- ☒ **Does your long-term plan clearly describe your agency's planned actions during the extension period?** (C)
- ☒ **Do the facts you considered in your analysis of this case address the extension criteria?** Facts should directly support the specific employment position extension criteria. In all cases, at least one supporting fact must address nonparticipation. If the participant has been cooperative, a statement stating such is sufficient. If there is a history of nonparticipation, but the agency has determined that the individual qualifies for an extension, provide a brief statement as to why. Supporting facts must also address specific employment position criteria. For example, if a CSJ participant has made all appropriate efforts to find unsubsidized employment and has been unable to do so, identify why the local labor market precludes a reasonable unsubsidized employment opportunity for the participant. Or, if a W-2 T participant has significant barriers preventing advancement to a higher W-2 employment position, identify all existing barriers. (D)
- ☒ **Have you included all required signatures (participant, FEP supervisor and W-2 Agency Chief Executive Officer)?**
- ☒ **Have you included the documentation you used to reach your approval decision?** Your request must include any available documentation that supports an individual's barriers. For example, it is extremely helpful to include pertinent case comment screens or education level assessments.

The following lists are not all inclusive. Although the list suggests types of supporting documentation, the suggestions may not be appropriate for every case.

Supporting documentation for W-2T extensions may include:

- Medical diagnoses of specific physical barriers for the participant or other W-2 group member.
- Medical capacity forms for the participant or other W-2 group member.
- Psychological/Psychiatric evaluations for the participant or other W-2 group member.
- SSI denial/appeal documentation for the participant or other W-2 group member.
- SSI advocacy documentation for the participant or other W-2 group member.
- Documentation supporting family crises.

Supporting documentation for CSJ extensions may include:

- A written assessment by the CSJ site supervisor of participant's work habits, potential for unsubsidized employment, participation, etc.
- A written statement regarding the efforts made by job developers (or similar staff) to assist participants in finding unsubsidized employment and the reasons why these efforts were unsuccessful.

Upon receipt of your extension form, the Regional Office will review the information provided. If something is missing or clarification is needed, the Regional Office will contact the agency as soon as possible and request the additional information.

The timeframe that the Division has to review the agency's extension decision does not begin until:

1. A completed request is received in the regional office; or,
2. The due date of the request (due date is 3 months prior to the last day of the participant's 24th month), whichever is later.

DES has 1 month to review initial extension information and 15 days to review subsequent extension information.

RECOMMENDED ACTION STEPS

Purpose of Recommended Action Steps

As stated earlier, it is crucial that all available resources be identified to assist the hard-to-serve population approaching their time limits. This is particularly important in light of the approaching 60-month federal and state lifetime limit. Therefore, the DWD's review of cases for which W-2 agencies have approved extensions allows DWD to identify additional, sometimes unique and innovative case management strategies being used around the state that are not indicated as being considered in the extension submission. We share these additional case management ideas with other W-2 agencies through recommended action steps as appropriate.

Additionally, DWD has links to other divisions within its agency, e.g. Division of Vocational Rehabilitation, and other state agencies. If a W-2 agency is experiencing difficulty or inconsistencies in obtaining services from other service providers, DWD may be able to assist.

The recommended case management steps are made based on information provided in the extension request. For example, if something in the record suggests that the participant is having trouble attending certain appointments or activities, a recommendation may be made to accompany the person to future appointments or ensure transportation is available for appointments. In order to communicate the intent behind the DWD's recommended future action steps, these will be tied to the item in the record that prompted a particular suggestion. For example, if the record indicated that a person expressed interest in a particular type of employment or activity, a recommendation may be made that based on the participants interest in "x" employment, assist the participant in contacting employers in "x" field to discuss ways to prepare for employment.

Under most circumstances, recommended action steps are targeted toward the participant; however, some steps may be suggested for other individuals in the W-2 group.

Requirement to Implement Recommended Action Steps

If a recommended action step is deemed inappropriate by the W-2 agency, the agency is not required to implement the recommendation. It is expected, however, that the agency will implement more appropriate alternatives to the state's suggestion. Therefore, in subsequent extension materials, agencies will be asked to explain how they addressed the barriers presented by a case including consideration of the recommended action steps contained in the previous extension letter and/or locally developed alternatives.

TRANSFERS

Communication and flexibility between W-2 agencies are key aspects to any case transfer under W-2. The current W-2 transfer policy states that when a participant moves to another county, and is able to continue in current activities, the W-2 agency from which the participant is transferring must determine when to terminate the employment position and must do so according to the needs of the participant, the agency, and the W-2 employer/work training provider. Just as a transfer may need to be delayed due to the convenience or appropriateness of ending a W-2 employment position, a transfer may also need to be delayed due to the fact that a case is approaching its time limit or is already in an extension period.

Therefore, the need to communicate and be flexible becomes even more important when a case approaching its time limit is transferred between agencies. Under AFDC, where time limits were not an issue, a new relationship was typically begun with the participant by the receiving agency and, for the most part, all the information the agency needed was in CARES. If particular assessment information was not available in CARES, an agency would take steps to gather that information for the participant, which most times meant starting from square one by setting up new assessment appointments.

Now, in light of time limited benefits, a FEP's priority for cases received through a transfer must be to obtain information **that is already available**. This means accessing CARES, asking the participant for any documentation **and contacting the transferring agency for additional case file information**. By

collecting information already available, it allows the receiving W-2 agency to provide seamless service to the participant rather than asking him or her to start over with assessments. Also, particularly for participants approaching their time limit, it saves valuable time on both the 24-month and 60-month clocks.

W-2 agencies should develop internal policies regarding how to contact other W-2 agencies for case information. In order to assist with the development of internal policies, we have identified a number of ways in which information regarding the transferring agency can be identified in CARES:

1. To identify the transferring W-2 agency.

The Office Transfer screen (ACCT) contains a history of the county and office numbers between which a particular case has been transferred. In order to identify which county and office the participant was transferred from most recently, TRAN to ACCT with the case number and a forward slash with a future date in the PARM field. For example TRAN to ACCT with 1234123412/010100 in the PARM field. Using the PF8 key, find the county and office number from which the case was transferred.

2. To identify the FEP in the transferring agency who most recently provided case management services to the participant.

The Wisconsin Works Information screen (ACWI) contains the FEP ID. As above, TRAN to ACWI with the case number and a forward slash with a future date in the PARM field. TRAN: ACWI
PARM: 1234123412/010100. Using the PF8 key, find the FEP ID of the most recent W-2 placement.

Once the FEP ID has been identified, TRAN to SMUM with the FEP ID in the PARM field to locate the FEP's name and telephone number.

3. To identify the transfer coordinator from the transferring agency.

CARES contains a transfer coordinator table that identifies all transfer coordinators. In order to identify the transfer coordinator from the transferring agency, TRAN to RTDT with TOCD in the PARM. Once you have identified the appropriate transfer coordinator, TRAN to SMUM with the Office Transfer Coordinator ID in the PARM to locate his or her phone number.

NOTE: This list does not contain the Milwaukee W-2 Agency Transfer Coordinators. The most current list of Milwaukee Transfer Coordinators can be obtained by calling Delores Parr at the Milwaukee Private Industry Council at 414-270-1742.

When developing internal transfer policies or when transferring a case between W-2 agencies, the following guidelines should be considered. If there are local agency agreements currently in place that conflict with the guidelines established below, contact your supervisor or program manager for further direction.

1. Prospective case management is the responsibility of the receiving agency.
2. An original case hard file stays where it was created. This means that an agency would not have to transfer its case hard file. Rather, upon request by the receiving agency, the transferring agency would copy and send the requested, appropriate information.
3. In 18+ month cases, the transferring and the receiving agencies must cooperate to accommodate the time and information requirements for extension reviews. On a case-by-case basis, the state will apply maximum flexibility to expedite the review process.
4. For those cases that transfer after an extension request has been sent to DWD for review, the **transferring** agency continues to be responsible for the case request which includes obtaining any additional information necessary for DWD to complete its review. Cooperation by the receiving agency would also be expected if appropriate.

5. An extension is granted to a participant, not an agency. Therefore, if a participant transfers to another W-2 agency, the extension transfers with him or her.
6. For those cases that transfer during an extension period, the receiving agency may reassess the participant's situation and determine that a change in case plan is necessary or they may make a determination that makes the extension no longer necessary, e.g. movement to another W-2 placement. However, the agency cannot deny an extension that has already been granted.

If a W-2 agency has difficulty obtaining case information from another W-2 agency, the requesting agency should contact the local DES Regional Office to help expedite the exchange of information.

SUBSEQUENT EXTENSION REVIEWS

Effective immediately, please use the attached 24-Month W-2 Employment Position Extension Review Request (DES 11283) when submitting subsequent extensions to DWD.